

UNITED STATES DISTRICT COURT  
District of Minnesota

UNITED STATES OF AMERICA,

INDICTMENT CR 17-107 PJS/HB

Plaintiff,

18 U.S.C. § 1591

18 U.S.C. § 1594(c)

v.

21 U.S.C. § 853

28 U.S.C. § 2461

- (1) MICHAEL MORRIS,  
a/k/a Bill,
- (2) CHATARAK TAUFFLIEB,  
a/k/a Maya,
- (3) PEERACHET THIPBOONNGAM,  
a/k/a Arm,
- (4) PAWINEE UNPRADIT,  
a/k/a Fon,  
a/k/a Jamjit Unpradit,  
a/k/a Pawinee Kiervadthananod,
- (5) SAOWAPHA THINRAM,  
a/k/a Nancy,
- (6) GREGORY ALLEN KIMMY,  
a/k/a Fat P,
- (7) WILAIWAN PHIMKHALEE,  
a/k/a Pim,  
a/k/a Paula,  
a/k/a Mona,  
a/k/a Chompoo, and
- (8) KANYARAT CHAIWIRAT,  
a/k/a Pan,

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

**INTRODUCTION**

1. The defendants, along with others known and unknown to the grand jury, are members of a large-scale international sex trafficking organization. Through the use of bondage debt and other means of force, fraud, and coercion, the organization traffics women from Thailand to cities across the United States, where

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the women are forced to engage in countless commercial sex acts for the financial benefit of the criminal organization. The women do not have freedom of movement and, until they pay off their bondage debt, are effectively modern day sex slaves.

2. Since at least 2009 and continuing until the present, the sex trafficking organization has trafficked hundreds of Thai women from Bangkok, Thailand, to various cities across the United States, including Minneapolis, Los Angeles, Chicago, Atlanta, Phoenix, Washington, D.C., Las Vegas, Houston, Dallas, and Austin. The victims of the organization are often from impoverished backgrounds and speak little English. Members of the criminal organization recruit these victims from Thailand with promises of a better life in the United States. The organization engages in widespread visa fraud in order to transport the victims to the United States.

3. The victims typically enter the United States through Los Angeles. The victims are then sent to various "houses of prostitution" located in cities across the United States. There, the victims are forced to work long hours—often all day, every day—having sex with strangers in order to attempt to pay down their bondage debt. The victims are isolated. They do not have the ability to choose who they have sex with, what sex transactions they will engage in, or when they will have sex. Until they pay off their exorbitant bondage debt—often between \$40,000 and \$60,000—the victims are effectively "owned" by the organization.

4. At various times, the organization operated out of at least seven identified houses of prostitution in the Minneapolis area and trafficked more than a dozen victims throughout Minnesota.

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**COUNT 1**

**Conspiracy To Commit Sex Trafficking  
18 U.S.C. § 1594(c)**

5. The allegations contained in paragraphs 1 through 4 of this Indictment are re-alleged as if stated in full herein.

6. From in or about January 2009 through in or about April 2017, in the State and District of Minnesota and elsewhere, the defendants,

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a/k/a Pan,**

did, in and affecting interstate and foreign commerce, knowingly conspire with one another and others, known and unknown to the grand jury, to recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, and benefitted, financially and by receiving anything of value, from participation in a venture which engaged in the previously described acts, and knowing that means of force, threats of

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force, fraud, coercion, and any combination of such means would be used to cause the person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a) and 1591(b)(1).

7. All in violation of Title 18, United States Code, Section 1594(c).

**FORFEITURE ALLEGATIONS**

8. The allegations contained in paragraphs 1 through 7 of this Indictment are re-alleged as if stated in full herein and are incorporated by reference for the purpose of forfeiture allegations.

9. As the result of the offenses alleged in Count 1 of this Indictment, the defendants,

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shall forfeit the following property to the United States pursuant to Title 18, United States Code, Section 1594:

(1) any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the offenses, and any property traceable to such property; and

(2) any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses, and any property traceable to such property.

10. If any of the above-described property is unavailable for forfeiture within the definition of Title 21, United States Code, Section 853(p), the United States intends to forfeit substitute property pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

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ACTING UNITED STATES ATTORNEY

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FOREPERSON